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Filing date: **10/22/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91201920
Party	Plaintiff Citigroup Inc.
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Submission	Other Motions/Papers
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Signature	/Bruce Goldner/
Date	10/22/2012
Attachments	Citigroup v. Citiair-opp 91201920-Amended & Supplemental Reliance Notice.pdf ( 16 pages )(13202507 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

----- x

CITIGROUP INC.,	:	
	:	Serial No. 85/219,849
Opposer,	:	
	:	Opposition No. 91201920
-against-	:	
CITIAIR, LLC,	:	
	:	
Applicant.	:	

----- x

**OPPOSER'S AMENDED AND SUPPLEMENTAL NOTICE OF RELIANCE**

Pursuant to Trademark Rules 2.120(j) and 2.122(b) and (d) through (f) of the Trademark Rules of Practice, Opposer Citigroup Inc. ("Opposer") hereby introduces into evidence the following document, in addition to the documents previously identified in (a) Exhibit A to Opposer's Notice of Reliance dated October 9, 2012 ("Exhibit A"); and (b) Opposer's Notice of Reliance – Confidential Information, dated October 9, 2012:

NOR Ex. 607: August 1, 2012 webpage, accessible at [www.eknazar.com/Alabama/ekclassifieds/showcategory.php?&keyword=citair](http://www.eknazar.com/Alabama/ekclassifieds/showcategory.php?&keyword=citair) (OPP013020).

This webpage is relevant to show at least the likelihood of confusion and dilution that would result from Applicant's registration of its mark. Specifically, the document is relevant to show the similarity in relevant trade channels and target demographic, as well as the market interface between Applicant and Opposer.

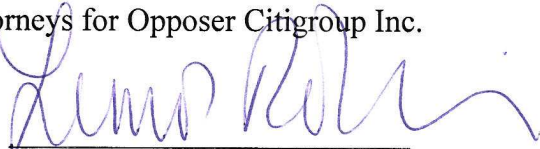
Furthermore, Opposer hereby amends its Exhibit A such that "NOR Ex. vq508" is replaced by "NOR Ex. 508." Opposer's amended Exhibit A is attached hereto.

Dated: New York, New York  
October 22, 2012

Bruce Goldner  
Kenneth Plevan  
Limor Robinson  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Four Times Square  
New York, NY 10036  
(212) 735-3000 (telephone)  
(212) 735-2000 (facsimile)

Attorneys for Opposer Citigroup Inc.

By:



A handwritten signature in blue ink, appearing to read 'Limor Robinson', is written over a horizontal line.

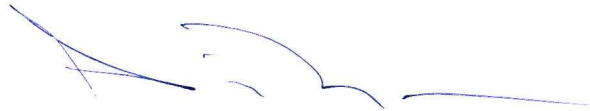
**CERTIFICATE OF SERVICE**

I, Sylvia Marquez, hereby certify that on this 22nd day of October 2012, I caused a true and correct copy of Citigroup Inc.'s Amended and Supplemental Notice of Reliance to be served on the following person in the following manner:

**BY E-MAIL (WITHOUT ATTACHMENTS) AND FEDERAL EXPRESS**

Matthew H. Swyers, Esq.  
The Trademark Company  
344 Maple Avenue West., Suite 151  
Vienna, Virginia 22180-5612

Attorney for Applicant  
Citaiir, LLC



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Sylvia Marquez



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## **EXHIBIT A**

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
<b>501</b>	OPP001489-1502	1/5/81 – The New Yorker: “Profiles: The Money Machine” (pp41-60)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>502</b>	OPP001473-1488	1985 – Harvard Studies in Business History XXXVII: “Citibank 1812-1970” (Cover page, Table of Contents, Introduction)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>503</b>	OPP001438-1439	11/3/06 – Chicago Tribune: “Citibank sits on top in bank call center survey” (p3)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>504</b>	OPP001523	6/23/1912 – The New York Times: “America’s Greatest Bank is One Hundred Years Old”	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>505</b>	OPP001524-1529	11/16/68 – Business Week: “Why Citibank is more than a bank” (pp78-88)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>506</b>	OPP001803	3/1/76 – Business & Finance: “Name Change to Citibank Becomes Official Today” (pD9)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>507</b>	OPP004562-4575	6/8/87 – Fortune: “Citibank Wows the Consumer” (pp48-54, 200-209)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>508</b>	OPP004591	3/21/80 – The New York Times: “Travel Checks, Citi-Style”	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority); travel-related services



<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				historically offered by Opposer under CITI Marks
<b>509</b>	OPP005105- 5114	5/29/83 – The New York Times Magazine: “Inside Citicorp: The Changing World of Banking” (pp15- 20, 37, 46)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>510</b>	OPP004723- 4726	3/20/01 - Financial Services Marketing: "Living Richly at Citibank Means There is More to Life than Money" (p12)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; long history of Opposer's use of CITI Marks (priority)
<b>511</b>	OPP008972- 8973	1/21/04 - The New York Times: "Strong Credit Card Portfolio Helps Spur Citigroup Profit" (pC4)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
<b>512</b>	OPP008964- 8965	12/14/04 - The New York Times: "Citigroup Says It Will Issue American Express Cards" (pC1)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
<b>513</b>	OPP008954- 8955	6/5/05 - The Associated Press: "Citigroup to Buy Federated"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
<b>514</b>	OPP008943- 8944	3/2/07 - The Associated Press Financial Wire: "Citigroup Eases Rules on Consumer Credit Card Accounts"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
<b>515</b>	OPP008931- 8932	10/1/07 - American Banker: "Citi, Expedia Eye Mass Market" (p7)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
<b>516</b>	OPP008921- 8922	2/21/08 - American Banker: "Citi Wins Contract To Issue Travel Cards For Defense"(p6)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card and travel services offered by Opposer under CITI Marks

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
517	OPP008896	10/16/09 - Cardline: "Citi's Global Branded Cards Unit Posts \$6 Million Profit" (p4)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
518	OPP008890-8891	8/10/10 - American Banker: "Citi Bolsters Commercial Card Features" (p11)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
519	OPP008888-8889	8/24/10 - American Banking and Market News: "Macys to Offer Citibank American Express Credit Card"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
520	OPP008855-8856	4/22/11 - Cardline: "Citi's Branded Card Operation Posts \$864 Million Q1 Profit" (p2)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
521	OPP008829-8830	1/4/12 - The Washington Times: "Citibank Links Card Rewards to Facebook; Holders Can Pool Points with Others" (pA9)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
522	OPP008818-8819	2/1/12 - American Banker: "Citi's iPad Banking App Now Accepts Credit Card Users"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card services offered by Opposer under CITI Marks
523	OPP008795-8796	5/16/12 - Zach's Investment Research: "Citi & AA Launch New Travel Cards"	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; credit card and travel services offered by Opposer under CITI Marks
524	OPP013132	5/18/05 - TODAY: "Citi Steps Up S'Pore Presence" (p33)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in Singapore; use of family of CITI Marks in Singapore; Applicant's intent in adopting a CITI-prefixed



<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				mark
<b>525</b>	OPP013157	1/12/06 - Singapore News: "Citi Launches Dividend Platinum" (p9)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in Singapore; use of family of CITI Marks in Singapore, including for credit card services; Applicant's intent in adopting a CITI-prefixed mark
<b>526</b>	OPP001441- 1443	11/13/00 - "Citigroup Announces New Generation of Online Trading and Banking with Cititrade and Citibank Online" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks
<b>527</b>	OPP001444- 1445	1/23/02 - "Citibank Introduces New Debit Card Earning American Airlines AAdvantage Miles" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card and travel services offered by Opposer under CITI Marks
<b>528</b>	OPP008970- 8970	3/22/04 - "Citi Cards Website Ranked #1 By Watchfire GomezPro; Citi Cards Site Top-Ranked for Fifth Consecutive Period" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority)
<b>529</b>	OPP009314- 9315	4/13/04 - "Citi Introduces Home Rebate Platinum Select MasterCard" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card services offered by Opposer under CITI Marks
<b>530</b>	OPP001455	3/29/06 - "US: Citibank Expands Distribution and Customer Reach with Internet Bank" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority)
<b>531</b>	OPP009179- 9181	10/5/06 - "Citi Expands Citi/AAdvantage Card Private Pass Program with Exclusive Cardmember Only Experiences and Access" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card and

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				travel services offered by Opposer under CITI Marks
<b>532</b>	OPP008933- 8935	6/4/07- "American Airlines and Citicards Celebrate 20- year Relationship" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card and travel services offered by Opposer under CITI Marks
<b>533</b>	OPP008929- 8930	10/29/07- "Citi Debuts New National Advertising Campaign for US Citi Cards" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of Family of CITI Marks (priority); credit card services offered by Opposer under CITI Marks
<b>534</b>	OPP009769	1/7/10 - "Citi Named Best Cash Management Bank by Finance Asia" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in U.S. and Asia; use of Family of CITI Marks
<b>535</b>	OPP009770	1/11/10 - "FinanceAsia Picks Citi as Best Bank in Asia" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks in U.S. and Asia; use of Family of CITI Marks
<b>536</b>	OPP008892- 8893	8/10/10 - "Citi Ranked Number One US Corporate Card Issuer by The Nilson Report" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card services offered by Opposer under CITI Marks
<b>537</b>	OPP008843- 8845	7/18/11 - "Citi Cards and American Airlines Introduce New Elite Traveler Credit Card with Expanded Suite of Co- Branded Product Offerings" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card and travel services offered by Opposer under CITI Marks



<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
538	OPP008816-8817	3/15/12 - " Citi Named Best Global Treasury and Cash Management Provider by Global Finance Magazine; Wins Eight Additional Awards Recognizing Continued Leadership in Regions and Categories, Including Best Purchasing Card Provider" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card services offered by Opposer under CITI Marks
539	OPP008806-8807	3/21/2012 - "Citi Launches Program Audit Tool for Commercial Card Clients" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks; credit card services offered by Opposer under CITI Marks
540	OPP009001-9003	6/13/12- "Citi Wins 2012 Celent Model Bank Award" (Press Release)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's family of CITI Marks; use of family of CITI Marks
541	OPP001391-1392	8/2/02 Citibank Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
542	OPP001394	12/30/06 Citi Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
543	OPP001396-1397	2/4/08 Citi Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
544	OPP001400	4/3/02 Citibank Website-CitiManager Commercial Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
545	OPP001402	8/5/04 Citibank Website-CitiManager Commercial Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
546	OPP001410	8/1/01 Citibank Website-Credit Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
547	OPP001412	6/17/05 Citibank Website-Credit Cards	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				CITI Marks (priority)
<b>548</b>	OPP012147-12148	8/11/2012 Citi Singapore Website	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
<b>549</b>	OPP011422-11423	8/11/2012 Citi Singapore Website-Credit Cards	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
<b>550</b>	OPP011847-11849	8/11/2012 Citi Singapore Website-Citibank Rewards Card	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
<b>551</b>	OPP011878-11880	8/11/2012 Citi Singapore Website-Citi Rewards	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
<b>552</b>	OPP012610-12615	8/11/2012 Citi Singapore Website-Citibank PremierMiles Card	2.122(e)	At least the likelihood of confusion and dilution: Use of CITI Marks in Singapore and targeting Singapore residents; Applicant's intent in adopting CITI-prefixed mark
<b>553</b>	OPP001543-1560	9/16/2008 Citibank.com Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
<b>554</b>	OPP006357-6496	2001 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>555</b>	OPP006497-6616	2002 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>556</b>	OPP006617-	2003 Citigroup Annual	2.122(e)	At least the likelihood of



<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
	6792	Report		confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>557</b>	OPP006793- 6972	2004 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>558</b>	OPP006973- 7172	2005 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>559</b>	OPP007173- 7380	2006 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>560</b>	OPP007381- 7596	2007 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>561</b>	OPP007597- 7848	2008 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>562</b>	OPP007849- 8132	2009 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>563</b>	OPP008133- 8444	2010 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>564</b>	OPP008445- 8764	2011 Citigroup Annual Report	2.122(e)	At least the likelihood of confusion and dilution: Scope of services offered by Opposer; Fame/strength of family of CITI Marks
<b>565</b>	Raj Dep. Exhibit 1	Opposer's Notice of Deposition to Applicant	2.120(j)	At least the likelihood of confusion and dilution: Deposition exhibit
<b>566</b>	Raj Dep. Exhibit 3	Trademark/Service Mark Application, Principal Register, TEAS Plus Application	2.120(j); 2.122(b)	At least the likelihood of confusion and dilution: Deposition exhibit (federal trademark application for

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				applied-for mark); cited priority date and goods/services
<b>567</b>	Raj Dep. Exhibit 4	Amended Notice of Opposition	2.120(j)	At least the likelihood of confusion and dilution: Deposition exhibit; Opposer's cited CITI-prefixed marks in family of CITI Marks
<b>568</b>	Raj Dep. Exhibit 7	Website Printout from www.citair.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; Applicant's use of applied-for mark; services offered by, or purported to be offered by, Applicant under applied-for mark
<b>569</b>	Raj Dep. Exhibit 8	Website Printout from www.citairtravel.com	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; Applicant's use of applied-for mark; services offered by, or purported to be offered by, Applicant under applied-for mark
<b>570</b>	Raj Dep. Exhibit 13	Photocopy of Citiair Travel Business Card	2.120(j)	At least the likelihood of confusion and dilution: Deposition exhibit; Applicant's use of applied-for mark
<b>571</b>	Raj Dep. Exhibit 15	CONFIDENTIAL EXHIBIT- REDACTED	2.120(j)	
<b>572</b>	Raj Dep. Exhibit 19	6/17/12-WHOIS Search Results for citairtravel.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; priority of Opposer's use of family of CITI Marks
<b>573</b>	Raj Dep. Exhibit 20	6/17/12-WHOIS Search Results for citairtravel.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; priority of Opposer's use of family of CITI Marks
<b>574</b>	Raj Dep. Exhibit 23	6/27/12-WHOIS Search Results for citair.net	2.120(j); 2.122(e)	At least the likelihood of confusion and dilution: Deposition exhibit; priority of Opposer's use of family of CITI Marks
<b>575</b>	OPP001909-1911	3/12/1964 "It's Your Citi" New York Times Advertisement (pp A14-A15)	2.122(e)	At least the likelihood of confusion and dilution: Fame/strength of Opposer's Family of CITI Marks;



<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
				historic use of Family of CITI Marks (priority)
576	OPP002038	6/21/05-Citigroup CitiDirect-Online Banking Website	2.122(e)	At least the likelihood of confusion and dilution: Historic use of Family of CITI Marks (priority)
577	OPP002102- 2105	TARR Report-CITIRAIL- 01651021-1991-07-16	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
578	OPP002072- 2075	TARR Report- CITIMILES-1878857- 1995-02-14	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
579	OPP002021- 2024	TARR Report- CITIDIRECT-2261522- 1999-07-13	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
580	OPP001984- 1987	TARR Report-CITI NEVER SLEEPS- 1104470-1978-10-17	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
581	OPP001943- 1947	TARR Report- CITIBANK-691815-1960- 01-19	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
582	OPP001895- 1898	TARR Report-CITI- 1181467-1981-12-08	2.122(d)	Claimed member of family of CITI Marks
583	OPP001862- 1865	TARR Report- CITIGOLD-1824600- 1994-03-01	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
584	OPP001831- 1834	TARR Report- CITICARD-1024861- 1975-11-11	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
585	OPP001822- 1825	TARR Report-CITICORP TRAVELERS CHECKS- 1380723-1986-01-28	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
586	OPP001813- 1816	TARR Report-IT'S YOUR CITI-1381750-1986-02-04	2.122(d)	Claimed member of family of CITI Marks
587	OPP002045- 2049	TARR Report- CITITRAVEL-2954363- 2005-05-24	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
588	OPP002843- 2847	TARR Report-CITI- 2424088-2001-01-23	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
589	OPP002767-	TARR Report-CITI-	2.122(d)	At least the likelihood of

<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
	2771	3086206-2006-04-25		confusion and dilution: Claimed member of family of CITI Marks
<b>590</b>	OPP002673- 2676	TARR Report- CITIMILES-1880842- 1995-02-28	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>591</b>	OPP002650- 2653	TARR Report- CITICARD-1423239- 1986-12-30	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>592</b>	OPP002617- 2621	TARR Report-CITI THANK YOU-3948111- 2011-04-19	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>593</b>	OPP002586- 2589	TARR Report- CITIMANAGER- 2565005-2002-04-30	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>594</b>	OPP002562- 2566	TARR Report-CITI FORWARD-3702463- 2009-10-27	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>595</b>	OPP002542- 2546	TARR Report-CITI FIELD-3635724-2009-06- 09	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>596</b>	OPP002523- 2526	TARR Report-CITI EXECUTIVE-4036335- 2011-10-04	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>597</b>	OPP002473- 2476	TARR Report-CITI DOLLARS-3412382- 2008-04-15	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>598</b>	OPP002422- 2425	TARR Report-CITI CASHRETURNS- 3419395-2008-04-29	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>599</b>	OPP002398- 2401	TARR Report- CITIBUSINESS-2263621- 1999-07-20	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>600</b>	OPP002376- 2380	TARR Report-CITI BONUS CASH CENTER- 3419264-2008-04-29	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>601</b>	OPP002326- 2330	TARR Report- CITIGROUP-2406753- 2000-11-21	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks



<b>NOR Ex. Number</b>	<b>Bates Range or Deposition Exhibit</b>	<b>Description</b>	<b>Trademark Rule</b>	<b>Relevance</b>
<b>602</b>	OPP002288-2292	TARR Report-CITIBANK-2636299-2002-10-15	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>603</b>	OPP002271-2274	TARR Report-CITIBANK-3622937-2009-05-19	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>604</b>	OPP002189-2193	TARR Report-CITI-3441460-2008-06-03	2.122(d)	At least the likelihood of confusion and dilution: Claimed member of family of CITI Marks
<b>605</b>	OPP013770-3835	Raj Non-Confidential Deposition Excerpts	2.122(e)	At least the likelihood of confusion and dilution: Discovery deposition excerpts of Prakash Raj: priority, Applicant's intent, fame of CITI family of marks, usage of applied-for mark; revenues of Applicant under applied-for mark; target population; weakness of applied-for mark
<b>606</b>	OPP013836-8368	Website printout from <a href="http://thankyoucompanion.com">thankyoucompanion.com</a>	2.120(j)	At least the likelihood of confusion and dilution: Credit card and travel services offered by Opposer under Opposer's family of CITI Marks
<b>607</b>	OPP013020	Website printout from <a href="http://www.eknazar.com">www.eknazar.com</a>	2.120(j)	At least the likelihood of confusion and dilution: Similarity in relevant trade channels and target demographic, as well as market interface between Applicant and Opposer
<b>801</b>	OPP013767-3769	CONFIDENTIAL EXHIBIT- REDACTED PAGE IN NOR EX. 605	2.120(j)	